

# JOSEPH & KIRSCHENBAUM LLP

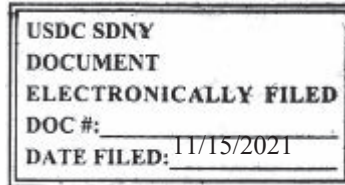
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November 12, 2021

**VIA ECF**



Honorable Alison J. Nathan  
Southern District of New York  
United States District Court  
40 Foley Square  
New York, NY 10007

**Re: *Sanchez et al v. KTG Multiservices, Inc. et al*, 21 CV 751 (AJN)**

Dear Judge Nathan,

We represent Plaintiffs in the above-referenced matter. The parties jointly submit this letter in accordance with your Honor's Order dated November 5, 2021 (dkt. no. 50) to respectfully update the Court as to status of this case and proposed next steps.


The parties have agreed to attend a mediation on November 30, 2021. The parties are hopeful that we will be able to reach a resolution at mediation, however, in the event the mediation proves unsuccessful, the only remaining discovery issue to be completed is the continued deposition of Defendants KTG Multiservices Inc. ("KTG") and Catalina Gonzalez. (Ms. Gonzales will testify on her own behalf as well as for KTG.) As Defendants produced thousands of payroll records after Ms. Gonzalez's first deposition and on the eve of the discovery deadline, Defendants consent to producing Ms. Gonzalez for a continued deposition limited in scope to the belatedly disclosed documents and related ancillary issues and documents.

In the interest of preserving the parties' time and resources, we respectfully request that the Court allow the Parties to conduct this deposition within three weeks after the mediation (if it is unsuccessful). Thereafter, Plaintiffs' anticipate filing a motion for class certification pursuant to Fed. R. Civ. P. 23 and both Plaintiffs and Defendants anticipate filing partial motions for summary judgment.

Based on the foregoing, the parties respectfully propose that the Court adopt the following schedule:

SO ORDERED.

1. Mediation to be held on November 30, 2021.
2. Status report on mediation to be sent to the Court by December 7, 2021.
3. KTG/Gonzalez deposition to be completed by December 21, 2021.
4. The Parties to submit a proposed briefing schedule for the class certification and summary judgment motions by December 28, 2021.

  
11/15/2021

The Parties also respectfully request that the Court adjourn the November 19, 2021 status conference *sine die* pending the outcome of mediation and motion practice, if necessary.

We thank the Court for its attention to this matter.

Respectfully submitted,

**JOSEPH & KIRSCHENBAUM LLP**

/s/Josef Nussbaum

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cc: All Counsel of Record (via ECF)